



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

137898 36

FEB 18 1992

REPLY TO THE ATTENTION OF:

5HSRL-65

Richard Shepherd
Project Coordinator
Conestoga-Rovers & Associates, Inc.
10400 W. Higgins Road, Suite 103
Rosemont, Illinois 60018

Dear Mr. Shepherd:

U.S. EPA and IEPA have reviewed the December 1991 "Final Construction Report" and have the comments listed in the attachments to this letter and below:

1. Page One, First Paragraph, last sentence - "1972" is inconsistent with what has been stated in the past. This date should be corrected.
2. Page One, Second Paragraph - it should be noted that U.S. EPA wrote a January 28, 1987 Addendum to the FS Report.
3. Page Two, first line - substitute "one" for "several" and insert "and a Dispute Resolution proceeding" after "revision".
4. Page Two, second line - insert "Revised" between "the" and "(Amended)".
5. Page Two, fourth line - insert "(revised September 1988)" between "1988" and "and".
6. Page Two, bullet points - delete the last three bullet points and add the following:

19. Page 19, Last Paragraph, line 4 - insert "oversight of the" between "the" and "USEPA".
20. Page 20, line 3 - insert "or into the Catch Basin located east of the NDWPA" between "NDWPA" and "A", insert "sometimes" between "were" and "utilized", and insert "to" between "utilized" and "wet".
21. Page 20, line 6. - substitute "January" for "February".
22. Page 20, Last Paragraph, second sentence - this sentence is incorrect - sand fill was hauled only for the purpose of establishing the six-inch sand layer; it was not used for backfill.
23. Page 20, last sentence - this sentence is incorrect - the trucks were covered with graded asbestos-containing sludge, not sand.
24. Page 21, line 4 - delete "Backfill and" from this line.
25. Page 21, Last Paragraph, lines 3 and 4 - delete "consistent with Attachment B." from these lines.
26. Page 21, last full sentence - it should be specified which specific area this sentence refers to.
27. Page 21, last line - insert "sometimes" between "LCGC" and "utilized".
28. Page 22, Last Paragraph - it should be noted in this paragraph that some of the "backfill" in the North Catch Basin was asbestos-containing sludge from the NDWPA.
29. Page 26, First Full Paragraph, first sentence - rewrite the beginning of this sentence as follows: "Following the change of procedure from grading ACM to grading by backfilling with sand..."
30. Page 36, line 3 - delete "and the Settling Basin" from this line.
31. Page 38, lines 1 and 2 - substitute "south" for "north" in line 1, and delete the parenthetical statement in line 2.
32. Page 42, second-to-last line - substitute "minimize" for "eliminate".
33. Page 49, Second Paragraph, third sentence - delete "with subsequent construction of a 24-inch thick remedial soil cover over portions of the Settling Basin taken out of use due to the sludge fill." from this sentence.

34. Page 59, line 9 - substitute "1989" for "1991".
35. Page 69, line 3 - insert "Article V of" between "in" and "the".
36. Page 71, First Paragraph - Delete this paragraph or reword it so that it is a true statement.
37. Page 75, Second Paragraph, line 13 - delete "total" and insert "greater than 5 μ m" between "fibers" and "permissible".
38. Page 76, line 6 - there are no samples from 1991 summarized in Table 8.1.
39. Page 78, last sentence - delete this sentence.
40. Page 88, second sentence - delete this sentence.
41. Page 88, Last Paragraph - the O&M Manual was approved by U.S. EPA and IEPA on December 11, 1991.

Please submit the revised report to U.S. EPA, IEPA, and WW Engineering and Science. If you have any questions concerning this letter or the attachments or would like to arrange a meeting or conference call to discuss the comments, please contact me at (312) 886-4742.

Sincerely yours,

Brad Bradley

Brad Bradley

U.S. EPA RPM

Attachments (2)

CC: Kurt Neibergall, IEPA

Eric Strang/Eric Meyers, WW
Engineering & Science



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Attachment 1
IEPA Comments

Illinois Environmental Protection Agency · P. O. Box 19276, Springfield, IL 62794-9276

Johns-Manville Asbestos Disposal Area, Waukegan, Illinois
CRA Final Draft-Final Construction Report
Illinois Environmental Protection Agency Comments

- Section 1.0, Page 1, Second Paragraph - Please note that although IEPA was not a party to the RI/FS consent order, this Agency informally provided technical comments on deliverables throughout the study.
- Section 1.0, Page 1, Third Paragraph - Please note that the State of Illinois (the Illinois Attorney General's Office and IEPA) is a formal party to the RD/RA consent decree, with USEPA Region V taking on "Lead Agency" responsibilities for this project.
- Section 2.2, Page 6, Fourth Paragraph - Wasn't CCJM also responsible for the RD/RA groundwater/surface water monitoring program? If not, please assign this activity to the appropriate party.
- Section 4.4, Page 16, Second Bullet - There appears to be a math error in the gravel cover profile. Shouldn't the statement read as eight inches of compacted gravel underlain by 16 inches of sand base (for 24 total inches of cover)?
- Section 4.4, Page 17, First Paragraph - The text states that clay borrow pit sites were analyzed for asbestos content as well as physical parameters. However, quite a few of the soil borrow sources listed in Tables 4.2 and 4.3 have "NT-Not Tested" given for them. Please explain? Additionally, several borrow sites listed are military or industrial facilities. Was any additional chemical analyses performed on these sources to verify that they were "uncontaminated". Please supplement the narrative on this issue.
- Section 4.4.1, Page 19, First Paragraph - I believe this is the first reference to the "plans". Please reference the official title/version of the ("as-built") plans and where these can be found if the reader desires.
- Section 4.4.9, Page 27, Second Paragraph - Please define "dry plant waste" and confirm whether or not it and the ACM referenced were double bagged and sealed prior to disposal in the asbestos disposal pit.
- Section 4.4.11, Page 28, Second Paragraph - The samples taken by CCJM of the miscellaneous waste disposal pit and sludge disposal pit on October 24 and 25, 1988 were actually splits of sampling performed jointly with IEPA. (The year is incorrectly quoted two additional times on page 29).
- Section 4.4.13, Page 31, First Paragraph - I believe this is the first point in the document in which "sludge" handling is discussed. It might be appropriate to define this plant waste for the uninformed reader here or in Section 4.4.15.
- Section 4.4.20, Page 38, Third Paragraph - Please explain the purpose of these culverts, if known, in the narrative.



Page 2

- Section 4.5, Page 42, Second Paragraph - Please define the acronym "IDOT" the first time it is used in the text.
- Section 5.2, Page 50, First Paragraph - Please state where the decontamination water from sludge dredging equipment was discharged to.
- Table 8.1 - Could this table be revised to "break out" the number of personnel samples versus control zone air monitoring samples?
- Section 8.4, Page 76, Fourth Paragraph - Please expand on the phrase "major level C remedial work" in reference to curtailment of air monitoring work.
- Section 8.5, Page 77, First Paragraph - Please state in this Section that water used for dust suppression was tested for asbestos content as noted in Section 11.3.
- Section 12.0, Page 88 - The upcoming post-construction soil cover monitoring work could be referenced here.

KDN:bjh/92r/20,21

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Attachment 2
WW Comments

**WW ENGINEERING & SCIENCE COMMENTS ON FINAL CONSTRUCTION
REPORT AND AS-BUILT PLANS SUBMITTED BY CONESTOGA-ROVERS ON
DECEMBER 16, 1991**

- P-10, 3.1.2** "USEPA OSC" should read USEPA RPM and/or OSC.
- 3.1.3** This is not a correct statement.
- P-14** NO TREES were "pushed over with a dozer". The only trees cleared with a dozer were in the Clean Borrow pit area to enable the dredging of sand.
- Table 4.2, Pg. 3 of 3** Where was the clay from Abbott used on site?
- Table 4.3, Pg. 1 of 2** Topsoil from Skokie Lagoon is listed by "O'BRIEN" as black
Pg. 2 of 2 organic clay. Also Sunset & Delaney "O'BRIEN" lists this as black silty clay with some sand. Are these in the wrong table?
- P-18** A dozer was used on sloped areas, as well as flat surfaces
- P-19, 4.4.1** This states "elevations and desired grades were achieved". Where is the as built drawing showing this?
- P-24, 4.4.6** Line four should read Transite®, not concrete. Line six should read USEPA RPM not OSC.
- P-29** "The USEPA OSC issued approval" should read, "The USEPA RPM issued approved".
- P-35, 4.4.18** "However test trenching". This was not test trenching. It was a drainage installation that was drawn in the original scope of work. This was changed after a meeting with IEPA, USEPA, and Manville.
- "Manville's OSR directed LCGC." Should read CRA/Manville OSR directed LCGC.
- P-38** The third paragraph states PVC piping or corrugated plastic is identified on Plan 4 and 6. However there is no detail (length, etc.) on these plans.
- P-43** The Plant requested 6-inch thick gravel road. It was built as an 8- to 10-inch thick gravel roadway.
- P-54, 6.3** Where is the plan of the seepage collection drains? Plan 13 does not show location/length/sizing or bedding of this construction.

Also, Plans 4, 6 and 7 do not show any detail as to length and size of seepage drains.

P-56 ○ The western end of the 48 feet concrete sewer pipe cast in place catch basin. Where is the detail of this?

P-57 ○ Two 18-inch diameter ductile iron pipes were installed, but the pipe lengths are not shown?

Also the Transite® piping was not transported. It was placed at the base of the slope and covered with sand.

P-60 ○ Plan 12 shows 95% compaction of bedding sand for the concrete spillway. There is no record in Appendix C-O'Brien Field Density Test Data of sand compaction of 95%. Where is this data?

P-61 ○ Where is the detail of this system? Plan 10 does not show any lengths. It also shows a 90° ELBOW but is not drawn at 90°. Is this drain system properly placed on the plan?

P-63, 6.10 A 10-inch diameter perforated PVC seepage drain was installed at the base of the sheet pile wall. Where is its length? Where does it drain to? Section R-R' shows this 10-inch drain as a 6-inch drain. Which is correct?

○ Plan 10 shows one waler but should two on the as-built drawings.

P-65, 6.12 Semi-trailer staging area was not constructed of a 24-inch thick class I granular cover. Look at CRA Plan for cover of this area and a 12-inch cover was approved and constructed. Plan 4 showing these supports is not correct.

P-66 All culverts were installed on a layer of granular material compacted to at least 95% Standard Proctor. Where is this data? It is not shown in Appendix C - O'Brien Field Density Test Data.

P-68 ○ Plans 4, 5, 6 and 7 show some of the rip rap erosion cover. Why isn't all the rip rap erosion cover shown?

P-75 "During the course of remedial action at the site, no exceedance of the 0.2 f/cc of total fibers permissible exposure level for on-site personnel was encountered." THIS IS NOT A TRUE STATEMENT. Appendix H shows at least two exceedance's of >0.2 f/cc.

P-84 "Analysis of this sample did not detect the presence of asbestos fibers." This is not correct. It did not have any asbestos fibers >10 um.

All the data in paragraph two should state >10 um to make these statements correct.

Paragraph three indicates that the borrow pit waters all had asbestos concentrations. This is not so. The pumping system was relocated to the west Borrow Pit Pond where the asbestos concentration was below the detection limit.

P-85, 11.4 "NO ACM was found" should read no ACM GREATER THAN 1% was found.

Table 11.2 Sample Data 13 to 16 are missing.

P-86 Paragraph two should be deleted. These samples were taken by Sam Jung without anyone else present. Table 11.2 sample 30-33 shows all these samples to be clay. This is not native material to this area. This was a gravel roadway.

Record drawing set October 1991 Plan 3 shows Area Z, Area Y, and the office trailer area as all remediated. We question whether the office trailer area should be included as a remediated zone.

Plan 4 semi-trailer staging area is not Class I gravel cover. Also no RIP RAP drain area is shown at the East end of the pumping lagoon.

Appx. E, Pg. G-14 Perhaps, the signed signature page should be inserted.

Plan #5 Where is the detail of the three 24" catch basins? Where do they discharge to?

Plan #6 Where are the rest of the drain pipes along the INDUSTRIAL CANAL? Also there is no RIP RAP Drain shown from Stage 2 & 8 to the settling basin.

Plan #7 The RIP RAP drain is missing from FUTURE MISC. WASTE DISPOSAL AREA. A drain is also missing from Sludge Disposal Pit to the settling basin. RIP RAP stone is missing from the ASBESTOS DISPOSAL PIT roadway area.

Plan #8 Section A-A' is not drawn as it was constructed. Look at how RIP RAP is keyed into the former slope. Section F-F' is not drawn as it was constructed. Where is the clay layer? Section H-H' is not drawn as it was constructed.

- Plan #9** Section P-P' and Q-Q' are not drawn as they were constructed. Where are the clay layers?
- Plan #10** Section R-R' shows only one waler. Where is the second waler? Where is the detail of the 6" perforated drain line? How many tie backs? Were the tie backs 30' or 15'?
- The collection basin level control drain plan shows no length on any piping. The drawing lists 3-10" PVC 90° elbows but are illustrated at less than 90° angle on the collection basin level control drain plan.
- Plan #11** Where is the drawing of the head wall structure for the 48" concrete pipe?
- Plan #12** Where is the O'BRIEN Field Density Test Data for the top, middle, and bottom stating "95% STANDARD PROCTOR DENSITY" was meet?
- Plan #13** Detail B and Detail E are not drawn as constructed.
- Plan #14** Settling basin energy dissipator detail is not drawn as constructed.